

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 In re:	Bankruptcy Case
6 PG&E CORPORATION,	No. 19-30088 (DM)
7 - and -	
8 PACIFIC GAS AND ELECTRIC	Chapter 11
9 COMPANY,	(Lead Case)
10 Debtors.	(Jointly Administered)

11 **SUPPLEMENTAL CERTIFICATE OF SERVICE**
12

13 I, Andrew G. Vignali, do declare and state as follows:

14 1. I am employed at Prime Clerk LLC ("***Prime Clerk***"), the claims and noticing agent
15 for the debtors in the above-referenced chapter 11 bankruptcy cases.

16 2. On September 29, 2020, at my direction and under my supervision, employees of
17 Prime Clerk caused the following document to be served by first class mail on the Eighth Omnibus
18 Supplemental Service List attached hereto as **Exhibit A**:

- 19 • Notice of the Reorganized Debtors' Eighth Omnibus Objection to Claims (No
20 Liability Claims), customized to include the claim number, debtor, claim amount
21 and priority, and the basis for objection of the disallowed claim, and claim number
and claim amount and priority of the surviving claim for each counterparty, a non-
customized copy of which is attached hereto as **Exhibit B**

22 3. I declare under penalty of perjury under the laws of the United States of America, that
23 the foregoing is true and correct and that if called upon as a witness, I could and would competently
24 testify thereto.

25 Executed this 5th day of October 2020, at New York, NY.

26 /s/ Andrew G. Vignali
27 Andrew G. Vignali
28

Exhibit A

Exhibit A

Eighth Omnibus Supplemental Service List
Served by first class mail

MMLID	NAME	ADDRESS	CITY	STATE	POSTAL CODE
6162233	George, Irene	Redacted			
6162233	George, Irene	Redacted			
6162233	George, Irene	Redacted			

Exhibit B

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbbkllp.com)

4 Peter J. Benvenutti (#60566)

5 (pbenvenutti@kbbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED DEBTORS' EIGHTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)

Response Deadline:
September 29, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Objected-To Claim(s)							Basis for Objection
Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	

On September 3, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Eighth Omnibus Objection to Claims (No Liability Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by September 29, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

October 13, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
 2 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
 4 Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined
 5 therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim
 6 seek recovery of amounts for which the Debtors are not liable. If you do **NOT** oppose the
 7 disallowance of your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a
 8 written Response to this Omnibus Objection and you do NOT need to appear at the Hearing. If you do
 9 nothing, the Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to
 10 protective, unliquidated claims relating to the Reorganized Debtors’ potential post-petition non-
 11 performance under an assumed agreement, you retain all remedies that would have existed had these
 12 Chapter 11 Cases not been filed, and the Reorganized Debtors represent that they will not raise any
 13 bankruptcy defenses.

14 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your
 15 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
 16 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
 17 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on September**
 18 **29, 2020 (the “Response Deadline”)**: You must file the Response through the Court’s electronic case
 19 filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’
 20 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
 21 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
 22 the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must
 23 arrange for the Response to be filed with the Court within two business days thereafter. If you do not
 24 have the ability to serve a Response electronically, the Response must be served by mail, express or
 25 some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the
 26 Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or
 27 commercial express service that will make actual delivery not more than two business days after the
 28 Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by
 29 email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,
 30 the number of the Omnibus Objection, and the fact that a paper Response is being delivered by
 31 express.

32 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
 33 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
 34 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
 35 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
 36 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
 37 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
 38 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
 39 and/or the name, address, and telephone number of your attorney and/or designated representative to
 40 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
 41 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
 42 otherwise resolve the Omnibus Objection on your behalf, if any.

43 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
 44 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
 45 later date. You will receive a separate notice of any such objection.

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free, by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to request a complete copy of the Omnibus Objection, including all Exhibits.

Dated: September 3, 2020

KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

Attorneys for Debtors and Reorganized Debtors